

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

11 DE JULIO 2022

María A. Clemente Rosa
PETITIONER

v.

THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD
FOR PUERTO RICO

PROMESA TITLE III
No. 17BK 3283- LTS

(Jointly Administered)

As representative of

THE COMMONWEALTH OF
PUERTO RICO, et a., Debtor.
THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY,
Debtor.

PROMESA TITLE III
No. 17 BK 3567-LTS

CLAIM. NUM. 133778

TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, as representative of
THE COMMONWEALTH OF PUERTO RICO, et al., Debtors:

HONORABLE JUDGE: HON. LAURA TAYLOR SWAIN.
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO
RICO/ COURT OF THE UNITED STATES DISTRICT FOR THE DISTRICT
OF PUERTO RICO

REPETUOUSLY REQUEST

MOTION

HONORABLE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO/ UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF PUERTO RICO AND HON. JUDGE LAURA TAYLOR
SWAIN, TO RESPECTFULLY COLLECT AND REQUEST, SO THAT THE
ARGUMENTS PRESENTED HERE HUMBLY BE CONSIDERED AND
THAT I MAY BE GIVEN THE OPPORTUNITY TO FILE SUCH MOTION, IF
APPROPRIATE BY LAW.

María A. Clemente Rosa appears, PETITIONER, CLAIM NO. 133778.
respectfully addresses, exposes, alleges and requests:

MOTION:

Dr. María A. Clemente Rosa addresses you very respectfully, by this means I request LA HON. JUDGE LAURA TAYLOR SWAIN, and the Hon. The Financial Oversight And Management Board For Puerto Rico, as representative of The Commonwealth Of Puerto Rico, et al. As debtor, and representative of The Puerto Rico Highways And Transportation Authority, as debtor as well, to allow me to file the motion, to Rule 3018(a) to make my claim to the debtor represented by the Puerto Rico Highways and Transportation Authority Rich.

LIST OF FACTS:

1. Honorable Judge Laura Taylor Swain, I respectfully address you hereby presenting how our system of highways and urban public roads is designed and configured, because for towns in rural areas, it has not been possible to achieve 100% optimal design of highways and transportation routes, accessible to the entire population, because the entire population has the same right. Urban highways and thoroughfares have links that cause crashes. They join the Sedas with the main roads, the roads are full of holes, the holes are year after year, and when the election year arrives they begin to fix the roads and build without planning, to obtain votes from the population. Unfortunately, the needs of the people are not being met.

The bridges built on the expressway that leads to the Teodoro Moscoso Bridge, at the exit for Trujillo Alto, are not identified to where each bridge and exit leads, when you kill the mimes you are turning back to Rio Piedras. This is a problem for the community, due to the poor configuration of planning, identification and construction of bridges and public roads, which we currently have in Puerto Rico.

2. Our transportation system is obsolete, it does not present an effective service for the population that does not have private transportation and lives in rural and urban areas, where the public transportation service does not reach.

3. To indicate what corresponds to me in said Motion, I respectfully present the Hon. Judge Laura Taylor Swain, the following: on Campo Rico Avenue, in Carolina, there is a Seda that totally merges with the left lane. In that same silk, on June 25, 2018, my vehicle was hit, which cost me \$6,000.00 to repair it. And the vertebral column, the neck, the knees, the cervical spinal cord reflected Lordosis, the bones C4-C5, C5-C6 resulted in minimal neural foraminal stenosis bilaterally. To this day I continue with the problem of the spine, the back, the neck and the knees. See appendix 1.

4. On the other hand, the express car service presents a failure to charge for service, or when it is intervened incorrectly, it immediately produces incorrect tickets and sends them to the driver improperly. I had to pay \$1,015.00 for unjustified fines. Fines that are sent with the same dates, times and repeated on the same day as if the driver passed, and passed again. And when it is not, they send you a list indicating innumerable dates of use of the express car. When one is going to claim those tickets with those fines. They tell you to ask for a meeting, to (review), evaluate the fines. Which leads you to pay those unfair fines because if not, interest will continue to rise, as happened to me. See appendix 2.

5. From my analysis, Puerto Rico needs to restructure our Transportation and Road system, to meet the needs of 100% of the people of Puerto Rico, to emerge with a Longitudinal Infrastructure Plan and to be implemented with transparency from the start. Startup phase. And to achieve this, it must begin with meeting the responsibility of paying creditors.

To this factor of lack of accessibility of transportation to some neighborhoods and sectors of the towns of the Island, we have to add to the existing collective transportation system (public buses), the deterioration in the availability and quality of service, the loss of users and their inefficient operation. In summary, we could conclude that the deterioration in the availability, quality of services and the loss of users in our Public Collective Transportation System is undermining our capacity for economic development.

It is for these reasons that I request that I be given the opportunity to file my motion under Rule 3018(a).

Hon. JUDGE LAURA TAYLORSWAIN, OF THE UNITED STATES DISTRICT COURT AND TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al, . Debtors: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO, I respectfully request that this Motion be considered, in accordance with the right you have, to be able to participate and vote according to Rule 3018 (a) in the Federal Bankruptcy procedure and that it be considered in accordance with the law, the humbly requested remedy of \$25,000.00 for damages caused by the debtor The Puerto Rico Highway and Transportation Authority.

RESPECTFULLY REQUESTED.

I CERTIFY that on this same date I have sent by CERTIFIED mail a true and exact copy of this TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors:

In Carolina, Puerto Rico, Today July 11, 2022



Dr. María A. Clemente Rosa
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Tower # 6 Carolina, P.R. 00979
Phone (787)385-2906

Date Filed: 6/29/2018
DEBTOR: Commonwealth of Puerto Rico/
THE PUERTO RICO HIGHWAYS
AND TRANSPORTATION AUTHORITY
CLAIM: NO. 133778

OTHER FILES WITH OTHER CLAIMS
139834, 92159 and 150849. 133537